

Exhibit 1

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JACK REESE, FRANCES ELAINE
PIDDE, JAMES CICHANOFSKY,
ROGER MILLER, and GEORGE
NOWLIN,

Plaintiffs,

vs.

Case No. 2:04-cv-70592-PJD-PJK

Hon. Patrick J. Duggan, U.S.D.J.

Hon. Paul J. Komives, U.S. Mag. J.

CNH GLOBAL N.V. and CNH
AMERICA LLC,

Defendants.

The Deposition of SUZANNE MARIE DANIELS, Ph.D.

Taken at 400 Galleria Officentre, Suite 117

Southfield, Michigan

Commencing at 9:28 a.m.

Friday, January 10, 2014

Before Mary Jo Power, CSR-1404, RPR, RMR, CRR

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1 Southfield, Michigan
2 Friday, January 10, 2014
3 9:28 a.m.

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5 SUZANNE MARIE DANIELS, Ph.D.,
6 was thereupon called as a witness herein, and after
7 having first been duly sworn to testify to the truth,
8 the whole truth and nothing but the truth, was
9 examined and testified as follows:

10 EXAMINATION

11 BY MR. BURCHFIELD:

12 Q. Would you please state your full name for the record.

13 A. Suzanne Marie Daniels.

14 Q. And you're a Ph.D. in economics; is that correct?

15 A. Yes.

16 Q. And could you give us just an overview of your
17 educational background: undergraduate degree, and
18 graduate degrees, please.

19 A. My undergraduate degree is in economics, bachelors;
20 and I have a Ph.D. in economics.

21 Q. From what institutions?

22 A. From Wayne State University, both degrees.

23 Q. And what were the dates of those degrees?

24 A. They are stated on my bio with my report.

25 Q. Okay. We'll get to that in short order.

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1 Ms. Daniels, let me ask the reporter to
2 mark as Daniels Exhibits 1 and 2 a -- two subpoenas
3 that I believe were served on you.

4 This will be number 1, copy for Counsel;
5 and this will be number 2.

6 MARKED BY THE REPORTER:

7 DEPOSITION EXHIBITS 1 and 2

8 9:29 a.m.

9 BY MR. BURCHFIELD:

10 Q. Dr. Daniels, I'm handing to you Daniels Exhibit 1,
11 which is a subpoena duces tecum dated December 13,
12 2013, and would you take a moment and let me know if
13 you've seen that document before.

14 A. Yes, I have seen this document before.

15 Q. You have. Okay.

16 And Daniels Exhibit 2 is a subpoena duces
17 tecum dated December 30, 2013, which has a
18 supplemental document request at the end. And take a
19 moment, let me know if you've seen that one before.

20 A. Yes, I've seen this document.

21 Q. Now, do you have any -- you're obviously appearing for
22 the deposition here in person today, and we'll ask
23 questions, but do you have any documents responsive to
24 these subpoenas to produce today?

25 MR. CANZANO: I'm going to interject or

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1 object here in that the time for the return of these
2 subpoenas has not yet occurred. We will be filing
3 a -- and I believe we either have or will be today
4 serving an objection to the December 30 subpoena.

5 The other one I don't want to say for
6 certain, because Darcie was handling this part of it,
7 but I believe that the response to that is essentially
8 that there are no further documents, you have the
9 rebuttal report, and the only other things that would
10 be -- that she relied on would be the documents
11 mentioned in there which came from you and are in your
12 expert's report.

13 MR. BURCHFIELD: Okay.

14 MR. CANZANO: But the December 30 one
15 regarding the mission -- I'll call that the mission
16 subpoena -- we are objecting to that.

17 MR. BURCHFIELD: Okay. Well, let me just
18 ask you: Do you intend -- do the plaintiffs intend to
19 withdraw the like subpoena that has been served on
20 Mr. Macey?

21 MR. CANZANO: I don't believe so.

22 BY MR. BURCHFIELD:

23 Q. Okay. Ms. Daniels, let's set aside Exhibit -- well,
24 Exhibit 2, let's look at the document request on that,
25 and this is the document request that Counsel referred

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1 to as the mission request. I think that's as fair a
2 consideration, without reading the whole thing, as
3 any.

4 You, just to be clear, you are not today
5 producing and have not produced any documents in
6 response to the document request at the end of Exhibit
7 2; is that correct?

8 A. They're not due yet till the 15th.

9 Q. But do you intend to produce any documents in response
10 to it?

11 MR. CANZANO: We're objecting, so there
12 won't be any documents produced.

13 BY MR. BURCHFIELD:

14 Q. All right. And that's your understanding as well?

15 A. That's my understanding.

16 Q. That's all I wanted to confirm for the record.

17 Now with regard to Exhibit 1, the document
18 request appended to the December 13 subpoena which
19 begins with the document request your rebuttal expert
20 report, is it your understanding, Dr. Daniels, that
21 all documents responsive to this request have been
22 already produced to us?

23 A. That is correct, because the documents were those that
24 were provided by the defense. Mr. Macey's report and
25 the references in his report is what I relied on.

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1 Q. Okay. Thank you.

2 MR. BURCHFIELD: Let me ask the reporter to
3 mark as Daniels Exhibit 3 a document entitled SNG
4 Consulting, LLC, Consulting Agreement.

5 MARKED BY THE REPORTER:

6 DEPOSITION EXHIBIT 3

7 9:34 a.m.

8 MR. BURCHFIELD: Thank you.

9 BY MR. BURCHFIELD:

10 Q. Dr. Daniels, I'm handing you Exhibit 3. Do you
11 recognize this document?

12 A. I do, yes.

13 Q. Is this the -- is this the consulting agreement that
14 relates to the services you have provided in this case
15 of Reese versus CNH?

16 A. Yes, it does. Yes.

17 Q. And just to confirm, under the heading Charges and
18 Payments, your rate for consulting services is \$200 an
19 hour?

20 A. Yes.

21 Q. And your rate is \$350 an hour for depositions, that
22 would be today; deposition preparation and travel
23 time; court, arbitration, mediation appearances; and
24 court, arbitration, mediation appearances,
25 preparation, and travel time; is that correct?